

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DAVID M. LANTING,)	
)	
Plaintiff,)	No.: 3:13-CV-00750
)	
v.)	JUDGE HAYNES
)	
CONVERGYS CUSTOMER MANAGEMENT)	
GROUP, INC.,)	
)	
Defendant.)	

PROPOSED AGREED ORDER FOR PRELIMINARY DISCOVERY

Pursuant to the Court's direction at the December 2, 2013 Case Management Conference, the parties have agreed to 90-day period in which to conduct limited discovery in an attempt to position the matter for resolution as follows.

1. By January 2, 2014 the parties will exchange written discovery. Both document requests and interrogatories shall be limited to 15 each for both parties and answered by February 3, 2014. In the event of a discovery dispute, the parties agree to submit the dispute to the Magistrate Judge for resolution in lieu of written motions.

2. By February 3, 2014, the parties will have set a date for Plaintiff's deposition, which must occur on or before March 3, 2014.

3. By March 3, 2014, the parties will have conferred to determine if additional discovery is necessary. If required, the parties will submit a request for a second Case Management Conference and submit to the Court in advance a proposed Case Management Order.

It is so **Ordered**.

Entered this the ____ day of _____, 2013.

WILLIAM J. HAYNES, JR.
United States District Judge

Approved for Entry:

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